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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CYDNEY LOBB,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-0623-WBS-JDP

STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 50 days, from June 23, 2025 to August 12, 2025, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time for his Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to staffing reductions and organizational changes, counsel for

1 the Commissioner has been tasked with additional duties and handling more cases, including the
2 instant case, which was recently reassigned to her. She also serves as jurisdictional coordinator,
3 which requires providing strategic guidance and advice on litigation matters, and such duties are
4 unpredictable, arise on an on-call basis, and are often time sensitive. The undersigned is also
5 scheduled to be out of the office at the end of June. Therefore, despite diligent efforts to manage
6 her workload, counsel for the Commissioner needs additional time in the instant case to review
7 the substantial administrative record, consider the issues that Plaintiff has raised, confer with her
8 client as necessary, and prepare the Commissioner's Cross-Motion.

9 Respectfully submitted,

10 Dated: June 17, 2025

CHERMOL & FISHMAN, LLC

12 By: /s/ Jane Cervantes*

13 JANE CERVANTES

14 Attorneys for Plaintiff

[*As authorized by e-mail on June 17, 2025]

15 Dated: June 17, 2025

MICHELE BECKWITH

16 Acting United States Attorney

MATHEW W. PILE

17 Associate General Counsel

Office of Program Litigation, Office 7

18 By: /s/ Margaret Branick-Abilla

19 MARGARET BRANICK-ABILLA

20 Special Assistant United States Attorney

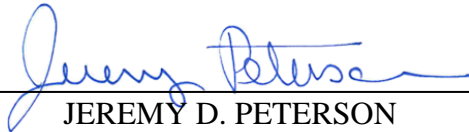
21 Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS ORDERED that the Commissioner's Cross-Motion for Summary Judgment shall be due on August 12, 2025 and Plaintiff's reply, if any, shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

IT IS SO ORDERED.

Dated: June 17, 2025



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE